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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION
TO WAYMO'S REQUEST TO FILE
MOTION *IN LIMINE* REGARDING
THE STROZ FRIEDBERG DUE
DILIGENCE**

Judge: Hon. William H. Alsup
Trial Date: December 4, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal exhibits to Uber’s Administrative Motion to File Under Seal Its Opposition To Waymo’s Request To File a Motion *in Limine* Regarding the Stroz Friedberg Due Diligence. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Precis Opposition Brief	Green-highlighted portions	Plaintiff
Exhibit 2 to the Declaration of Maxwell V. Pritt (“Pritt Decl.”)	Entire Document	Plaintiff
Exhibit 3 to the Pritt Decl.	Entire Document	Plaintiff
Exhibit 4 to the Pritt Decl.	Entire Document	Plaintiff
Exhibit 5 to the Pritt Decl.	Entire Document	Plaintiff
Exhibit 6 to the Pritt Decl.	Entire Document	Plaintiff
Exhibit 7 to the Pritt Decl.	Entire Document	Plaintiff
Exhibit 8 to the Pritt Decl.	Entire Document	Plaintiff

The green-highlighted portion of the Precis Opposition Brief and the entirety of the deposition transcript excerpts in Exhibits 2, 3, 4, 5, 6, 7, and 8 contain information that Waymo considers or may consider “Confidential” and/or Highly Confidential – Attorneys’ Eyes Only” under the Protective Order, or that Waymo asked Uber to file under seal. (*See* Pritt Decl., ¶ 4.) Filing the entirety of these deposition transcript excerpts under seal is consistent with the October 24, 2017 protocol that the Special Master directed the parties to follow regarding confidentiality in this case.

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on October 25, 2017.

For the forgoing reason, Uber request that the Court enter the accompanying Proposed Order granting this administrative motion to file documents under seal and designate the service copies of these documents as “Confidential” and/or Highly Confidential – Attorneys’ Eyes Only.”

1 Dated: October 25, 2017

BOIES SCHILLER FLEXNER LLP

2 By: /s/ Karen L. Dunn

3 Karen L. Dunn

4 *Counsel for Defendants*
5 UBER TECHNOLOGIES, INC. AND
6 OTTOMOTTO LLC
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